REMARKS

This is intended as a full and complete response to the Final Office Action dated December 14, 2005, having a shortened statutory period for response set to expire on March 14, 2006. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-36 are pending in the application. Claims 1-36 remain pending following entry of this response.

Claim Rejections - 35 U.S.C. § 103

Claims 1-36 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Birnbaum et al.* (U.S. 2002/0143878 A1, hereinafter *Birnbaum*) in view of *Smith et al.* (U.S. 6,578,078, hereinafter *Smith*).

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143. The present rejection fails to establish at least the third criteria, as described below.

The Cited References

In the Examiner's rejection under 35 U.S.C. Sec. 103(a), the Examiner cites *Birnbaum* and *Smith*.

In *Birnbaum*, a mini-application is used to enable web collaboration between two computing devices. *See* Abstract; Para. 0051, Pg. 4. The collaboration provided enables users at a first and second computing device to browse the Internet in unison and may be used for remote training of an employee. *See* Para. 0094, Pg. 8. When a

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connection is established between the first and second computing device, the mini-application is downloaded to the first computing device. *See* Paras. 0050-0051, Pg. 4. The mini-application monitors the first computing device for changes and sends information about the changes to the second computing device which implements the information by acting on or displaying that information. *See* Paras. 0055-0056, Pg. 4. For example, the mini-application monitors "predetermined changes in the web browser program" on the first computing device. *See* Para. 0065, Pg. 5. When a change in browser activity is detected, information regarding the change is collected and sent to an agent's computing device by the mini-application. *See* Para. 0067, Pg. 5.

The Prior Art References Do Not Teach or Suggest All the Claim Limitations

The Rejection of Claim 11 and Dependents

With respect to claim 11, and the claims that depend therefrom, the claim describes receiving a change request from a web browser, the change request indicating the web browser has detected a change related to a web page for which information is stored in the database. The Examiner states that *Birnbaum* discloses "receiving a change request from a web browser, the change request indicating the web browser has detected a change related to a web page for which information is stored in the database" at Fig. 2A and Paras. 0056, 0064 - 0065, and 0067 of *Birnbaum*.

From the description of *Birnbaum* provided above, it should be clear that *Birnbaum* does not teach the claimed elements for multiple reasons. First, in *Birnbaum*, changes in a web browser are detected, not a change related to a web page. *Birnbaum* specifically states that "the mini-application monitors for predetermined changes *in the web browser program* on the first computing device". *See Birnbaum*, Pg. 5, Para. 0065. If a change in browser activity on the customer computing device is detected, then information regarding the change is collected and sent to the agent's computing device. *See Birnbaum*, Pg. 5, Para. 0067. While the Examiner states that "the information that [is] detected can be new information entered by the user, information entered into a form by the user" and that "this information [is] related to a web page because the user

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used a web browser to enter information" (*See* Examiner's *Response to Arguments* in *Final Office Action dated December 14, 2005*, hereinafter *Final Office Action*, Pg. 7, Item 4), *Birnbaum* merely states that a change in browser activity is monitored, not a change related to a web page. *See id.* Accordingly, the cited section does not describe receiving a change request from a web browser, the change request indicating the web browser has detected a change related to a web page for which information is stored in the database. Withdrawal of the rejection is respectfully requested.

Furthermore, in *Birnbaum*, information regarding a change in the web browser program is received from the mini-application, and not a web browser. *See* Para. 0067, Pg. 5. In the Examiner's *Response to Arguments* (*Final Office Action*, Pg. 8, Para. 1), the Examiner states that *Birnbaum* discloses a web browser in each computing device and that in Fig. 2A information for a change is detected from a browser. However, in describing Fig. 2A, *Birnbaum* clearly states that the customer's computing device receives a mini-application and that "the mini-application monitors for predetermined changes in the web browser program on the first computing device". *See* Pg. 5, Paras. 0061 and 0065. Thus, in *Birnbaum*, the mini-application, not a browser (as asserted by the Examiner), monitors for predetermined changes. Accordingly, the cited figure does not describe "receiving a change request from a web browser, the change request indicating *the web browser has detected a change* related to a web page for which information is stored in the database" because in *Birnbaum*, the mini-application, and not the browser, detects the predetermined changes. Therefore, withdrawal of the rejection is respectfully requested.

Finally, *Birnbaum* does not teach detecting a change related to a web page for which information is stored in a database, because *Birnbaum* does not describe information stored in a database, nor does *Birnbaum* contain the term "database". However, in the Examiner's *Response to Arguments* (*Final Office Action* Pg. 7, Item 4), the Examiner states that "the memory in the agent browser is represented as a "database" that can be used to store new information such as [a] cookie or new

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information in its memory". Accordingly, the Examiner appears to equate storing data in memory with storing data in a database. However, as well known to those skilled in the art, a memory alone is not a database. For example, a memory may be defined as "a unit of a computer that preserves data for retrieval", whereas a database may refer to a "one or more large structured sets of persistent data, usually associated with software to update and query the data." *See* entries *"memory"* and *"database"* at *www.dictionary.com*. Thus, a database implies at least a structured set of data which may be queried, whereas data in a memory may not necessarily be structured and accessible via queries. Such a distinction between the terms "memory" and "database" is well known to those skilled in the art. Accordingly, the memory (nor the information contained therein) in *Birnbaum* is not a database, and *Birnbaum* therefore does not describe "receiving a change request from a web browser, the change request indicating the web browser has detected a change related to a web page for which information is stored in the database."

The Rejection of Claim 1 and Dependents

With respect to claim 1, and the claims that depend therefrom, the claim describes a method for updating a database containing information related to one or more web pages. The method includes monitoring operations of a web browser program to detect an event indicating a change involving a web page for which information is stored in the database. The Examiner states that *Birnbaum* describes "monitoring operation of a web browser program to detect an event indicating a change involving a web page for which information is stored in the database" at Fig. 2A and Paras. 0056, 0064 - 0065, and 0067 of *Birnbaum*. As described above, *Birnbaum* does not teach detecting a change related to a web page for which information is stored in a database. Accordingly, Applicant respectfully submits that *Birnbaum* does not disclose the cited limitation. Accordingly, withdrawal of the rejection is respectfully requested.

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The Rejection of Claim 21 and Dependents

With respect to claim 21, and the claims that depend therefrom, the claim describes a processor which, when executing the database update program, is configured to update at least one table in the database containing information about a web page in response to receiving a change request from a web browser, the change request containing information indicating the web browser detected a change event related to the web page. Examiner cites *Birnbaum* as teaching the claimed limitation. However, as described above, (i) in *Birnbaum*, changes in a web browser are detected, not a change related to a web page, (ii)*Birnbaum* does not teach *at least one table in the database containing information about a web page*, and (iii) in *Birnbaum* information regarding a change in the web browser program is received from the mini-application, and not a web browser. Accordingly, Applicant respectfully submits that *Birnbaum* does not disclose the cited limitation. Accordingly, withdrawal of the rejection is respectfully requested.

The Rejection of Claims 29 and 33 and Dependents

With respect to claims 29 and 33, and the claims that depend therefrom, the claims describe automatically accessing each network address on a list of network addresses referenced in the database, determining one or more changes in location or content related to a web page associated with each network address accessed, and automatically updating the database according to the one or more changes. The Examiner argues that *Smith* teaches automatically accessing each network address on a list of addresses referenced in a database, referring to Fig. 4 and Col. 13, Lines 30-50.

First, as previously noted by the Applicant, the cited sections are directed to redirecting and do not teach the claimed limitation. Also, while the Examiner states that claim 29 "further includes" an additional element relative to claims 11 and 1, Applicant notes that the elements in claim 29 are not included in claims 11 or 1, nor does claim 29 depend from the cited claims. Finally, with respect to claim 33, the Examiner does not provide a substantive rejection of the claims. While the claims are not separately

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addressed, Applicant submits that to the extent the elements of claim 33 are similar to those of other claims address herein, the elements of claim 33 are not taught in *Smith*. Accordingly, withdrawal of the rejection is respectfully requested.

Therefore, the claims are believed to be allowable, and allowance of the claims is respectfully requested.

Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Gero McClellan, attorney of record, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted, and
S-signed pursuant to 37 CFR 1.4,

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